

AUG 22 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

DOCKET FILE COPY ORIGINAL

the 27.5-29.5 GHz Frequency Band, to
Reallocate the 29.5-30.0 GHz Frequency Band,
to Establish Rules and Policies for Local
Multipoint Distribution Service and for
Fixed Satellite Services

[illegible]

CC Docket No. 92-297

No. of Copies rec'd
List ABCDE

078

USTA's comments urged the Commission to permit open eligibility for participation in LMDS auctions.³ Most comments strongly recommended that the Commission expedite allocation of LMDS licenses for facilities-based voice and video services. In addition, unrestricted, open eligibility is supported by many commentators addressing the issue. Commentators opposed to LEC participation in LMDS auctions (1) ignore the prior record in this proceeding, (2) reject Commission decisions in other proceedings which favored open eligibility, (3) disregard legislative history in the Telecommunications Act of 1996 ("1996 Act") supporting LEC participation in LMDS, and (4) fail to present legitimate public policy or legal arguments in support of their quest to limit competition for LMDS licenses. USTA commends the Commission for its initial findings favoring open eligibility for LMDS licenses, and believes that consumers and the public treasury will benefit from the Commission moving swiftly to implement regulations to make new voice and video services a reality. The public interest demands nothing less.

II. ARGUMENTS TO RESTRICT OR BAN LEC PARTICIPATION IN LMDS AUCTIONS ARE DISCRIMINATORY ANTI-COMPETITIVE AND SELF-SERVING

The commentators opposed to open eligibility can be placed into two categories: (1) small entrepreneurial companies⁴ and (2) MCI.⁵ Entrepreneurial companies argue that they

³ See *Comments of USTA* (August 12, 1996).

⁴ See, e.g., *Initial Joint Comments of Allied Associated Partners, L.P. & GELD Information Systems* (August 12, 1996); *Comments of Cellularvision Technology and Telecommunications, L.P.* (August 12, 1996) *Comments of ComTech Associates, Inc.* (August 12, 1996); *Opportunities Now Enterprises (O.N.E.), Inc.*, (August 9, 1996); *Comments of*

would be unable to compete for LMDS licenses and provide facilities-based voice and video services if incumbent LECs are not restricted or excluded from LMDS auctions.⁶ Those opposed to permitting LEC participation contend that LECs would misuse their resources and market power to preempt competition in both video and telecommunications services.⁷

MCI also finds eligibility restrictions barring LECs and incumbent cable providers from bidding on licenses in their areas of service necessary because LECs and cable companies “have monopoly power, and thus have a plain economic incentive to delay or exclude entry and competition.”⁸ According to MCI, LECs would warehouse LMDS licenses because “they value the spectrum more highly than others because of the ‘opportunity costs’ of lost monopoly profits and market share.”⁹

USTA asserts that public policy, prior FCC decisions, and the 1996 Act support open and unrestricted LEC participation in LMDS auctions. The entrepreneurs and MCI fail to raise compelling arguments to rebut the comments of LECs favoring open eligibility for LMDS

WebCel Communications, Inc. (August 12, 1996); *See also, Comments of the Competition Policy Institute* (August 12, 1996)(argument raised in opposition to open, unrestricted, LEC participation in LMDS are akin to those raised by the entrepreneurs and MCI and should also be rejected for the reasons stated in these reply comments).

⁵ *See MCI Comments* (August 12, 1996).

⁶ *See, e.g., Initial Joint Comments of Allied Associated Partners, L.P. & GELD Information Systems* at 3; *Comments of Cellularvision Technology and Telecommunications, L.P.* at 3-4; *Comments of ComTech Associates, Inc.* at 9; *Opportunities Now Enterprises (O.N.E.), Inc.*, at 1; *Comments of WebCel Communications, Inc.* at 13.

⁷ *Id.*; *See also, Comments of the Competition Policy Institute* at 6-8.

⁸ *See MCI Comments* at 4.

⁹ *Id.* at 6.

licenses. Simply put, no entity should be favored over a competing interest. In addition, entrepreneurs may lack financial and technical resources to build LMDS in large and small communities. The Commission, however, has other options available to ensure participation by small businesses in LMDS auctions without restricting LEC participation. As stated in Joint Comments filed by Bell Atlantic and SBC, "If the Commission decides that small businesses should receive advantages in competing for LMDS spectrum, it can achieve these goals by offering bidding credits, installment payment arrangements, and other benefits. It does not need to impose rigid entry barriers in order to promote small business involvement in LMDS."¹⁰ USTA urges the Commission to look at the facts, dismiss the rhetoric of special interests who would impede the development of LMDS, and open LMDS auctions to all.

The argument that LECs would use their resources, coupled with LMDS licenses, to preempt competition in the telephony and video markets in their local communities ignores the reality of today's marketplace. The 1996 Act has opened every market to competition. Within the local exchange market, LECs are required to meet interconnection, unbundling and collocation requirements.¹¹ Competition from cable companies like TCI and Time Warner, interexchange companies like AT&T and MCI, competitive access providers like MFS and Teleport, cellular companies, and PCS providers like Sprint Spectrum, offer vigorous

¹⁰ See *Joint Comments of Bell Atlantic Corporation and SBC Communications, Inc.* at 11.

¹¹ See *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98, *Interconnection between Local Exchange Carriers and Commercial Mobile Radio Service Providers*, CC Docket No. 95-185, FCC 96-325, *First Report and Order*, released August 8, 1996; *Second Report and Order and Memorandum Opinion and Order*, released August 8, 1996.

competition. As LECs explore video programming opportunities, like open video systems, they will face competitive challenges from incumbent DBS, cable, broadcasters and other providers of video programming already in the market. Clearly, LECs have no incentive and no ability to forestall competition in the telephony or video markets with or without LMDS licenses.

III. FCC POLICY AND REQUIREMENTS OF THE TELECOMMUNICATIONS ACT SUPPORT OPEN ELIGIBILITY AND LEC PARTICIPATION IN LMDS AUCTIONS

Contrary to opposing arguments, public policy favors open eligibility for LMDS licenses. Commission Chairman Reed Hundt has stated “The goal of the Telecommunications Act is to let anyone enter any communications business -- to let any communications business compete in any market against any other.”¹² In addition, Chairman Hundt expressed the view that successful implementation of the 1996 Act required the Commission to answer the question “... are we going to succeed in writing rules that support competitive markets as opposed to favoring individual competitors?”¹³ The record in this proceeding supports open eligibility and unrestricted access to LMDS licenses on a competitive basis.¹⁴ As USTA and others have expressed, the Commission has consistently held that open eligibility promotes the selection of

¹² See R. Hundt, *Implementing the Telecommunications Law of 1996: The Real Work Begins*, Newsweek Telecommunications Forum, Washington, D.C. (February 21, 1996).

¹³ *Id.*

¹⁴ See *Comments of USTA* at 4-5; *Comments of Ameritech* at 2; *Comments of BellSouth* at 2; *Joint Comments of Bell Atlantic Corporation and SBC Communications, Inc.* at 9-11; *U.S. West, Inc. Comments* at 2.

entities capable of swiftly deploying new technologies for the benefit of consumers.¹⁵ Unlike opposing commentators, USTA supports competition over regulations which are anti-competitive, discriminatory, and designed to manipulate the outcome of auctions by favoring some potential competitors over others.

USTA and others also expressed that there are no legitimate legal grounds on which the Commission should deny LECs the opportunity to bid on LMDS licenses to serve their local communities.¹⁶ Congress has clearly expressed its support for LECs providing LMDS. As USTA and BellSouth noted,¹⁷ and opposing commentators have totally ignored, Congress specifically stated that LECs can provide video programming “by any means” which by definition includes LMDS.¹⁸ If open eligibility is to have any meaning it must permit unrestricted participation by any interested entity in providing LMDS anywhere in the country. The Commission should affirm its earlier opinion in favor of open eligibility.¹⁹ Similarly, the Commission should not impose in-region restrictions on LECs should the Commission reject

¹⁵ See *Comments of USTA* at 9; *Comments of Ameritech* at 4; *Joint Comments of Bell Atlantic Corporation and SBC Communications, Inc.* at 3-6.

¹⁶ See, e.g., *Comments of USTA* at 4; *Comments of Ameritech* at 2-3; *Comments of BellSouth* at 2; *Joint Comments of Bell Atlantic Corporation and SBC Communications, Inc.* at 9-10; *US West Comments* at 2; *Comments of Roseville Telephone Company* at 3-4; *Comments of Pioneer Telephone Association, Inc.* at 2; *Comments of PacificTelesis Group* at 1; *Comments of the Ad Hoc Rural Telecommunications Group* at 1-3; *Comments of Farmers Telephone Cooperative, Inc.* at 2-3.

¹⁷ See *Comments of USTA* at 6; *BellSouth Comments* at 3.

¹⁸ See *Telecommunications Act of 1996, Conference Agreement*, S. Rep 104-23 at 170; *Comments of USTA* at 6; *Comments of BellSouth* at 3.

¹⁹ See *Fourth Notice* at ¶108.

efforts to impose a ban on LEC participation in the LMDS auctions. USTA supports comments opposing restrictions on service offerings by LECs in their local communities.²⁰

Some comments also suggest that LECs would bid on LMDS as a way to thwart in-region competition by “warehousing” licenses. The licensing process is the first, not the last, step that a successful LMDS bidder must take to make a profit on providing voice and video services to consumers. It would be foolhardy for LECs to spend large sums of money to win LMDS licenses and not provide services as a means to restrict competition.²¹ Clearly, LECs have every incentive to exploit LMDS licenses to their fullest economic value to maximize the return on the investment in winning an LMDS license.²²

The Commission’s suggested timetable for deploying LMDS, after the license is won, also serves as a basis for rejecting the argument that LECs would “warehouse” LMDS licenses. The Commission has proposed that LMDS licensees provide service to one-third of the population in their service area within five years and two thirds of the population within ten years.²³ Under this schedule, a licensee has no incentive to “warehouse” licenses.²⁴ With this ambitious schedule, LMDS licensees must possess the financial and technical capability to

²⁰ See, e.g., *Joint Comments of Bell Atlantic Corporation and SBC Communications, Inc.* at 13-16; *Comments of BellSouth* at 2.

²¹ See *MCI Comments* at 6; *Comments of WebCel* at 9.

²² See, e.g., *Comments of Roseville Telephone Company* at 6, n.5; *US West, Inc. Comments* at 4; *Comments of Pioneer Telephone Association, Inc.* at 2.

²³ See 11 FCC Rcd 53, 96 at ¶117.

²⁴ See *Comments of the Ad Hoc Rural Telecommunications Group* at 3; *Comments of the National Telephone Cooperative Association* at 3.

swiftly deploy LMDS. By denying or restricting LEC participation in LMDS auctions, the Commission may very well limit the development of LMDS.

USTA also cautioned in its Comments that small and rural communities may be denied the benefits of LMDS should the Commission fail to adopt an open and unrestricted auction process.²⁵ USTA supports the public interest arguments raised by a number of rural telephone companies that open eligibility will benefit the consumers that they serve, while restrictions placed on LECs would deny consumers access to new technologies.²⁶

It is also argued that anti-trust violations would occur should LECs provide in-region LMDS.²⁷ The basis of this argument is that LECs would merge their existing networks in conjunction with LMDS to thwart competition.²⁸ This argument is baseless. The Commission will award licenses through an auction process. The awarding of a license to provide service is not a merger. In addition, the Commission has found it to be in the public interest to award licenses to LECs to provide other telecommunications services in their communities of service.²⁹ Those opposed to open, unrestricted, LEC participation in LMDS auctions raise bogus anti-trust concerns in an effort to eliminate those potential competitors in better financial positions to

²⁵ See *Comments of USTA* at 6.

²⁶ See *Comments of the Ad Hoc Rural Telecommunications Group* at 4-6; *Comments of Roseville Telephone Company* at 6-7; *Comments of Pioneer Telephone Association, Inc.* at 2-3; *Comments of the National Telephone Cooperative Association* at 2; *Comments of Farmers Telephone Cooperative, Inc.* at 2-3.

²⁷ See *Comments of SkyOptics, Inc.* (August 12, 1996).

²⁸ *Id.* at 2-4.

²⁹ See *Comments of USTA* at 2-3; *Joint Comments of Bell Atlantic Corporation and SBC Communications, Inc.* at 3-6,

become winning bidders. Anti-trust laws, however, are intended to protect competition not competitors. USTA maintains that there are no anti-trust issues presented in this proceeding and that the Commission should adopt an open, unrestricted, eligibility policy for the LMDS auctions.

IV. REGULATORY FORBEARANCE SHOULD BE APPLIED TO OPEN ELIGIBILITY FOR LMDS AUCTIONS

The Commission's *Fourth Notice* suggests that application of attribution and effective competition standards may benefit competition.³⁰ USTA is opposed to such eligibility and use restrictions. As USTA stated in its Comments:

The centerpiece of the 1996 Act is competition in the telecommunications and video programming markets. The Commission's objectives should mirror those contained in the 1996 Act: "... to provide for a pro-competitive, de-regulatory national policy framework designed to accelerate rapidly private sector deployment of advanced telecommunications and information technologies and services to all Americans by opening all telecommunications markets to competition"³¹

Congress has clearly stated its overwhelming preference for competition over burdensome regulations by favoring unrestricted LEC participation in LMDS. The Act also provides that the Commission should forbear from unnecessary regulations.³² Regulatory forbearance is all the more appropriate given the Commission's position of supporting

³⁰ See *Fourth Notice* at ¶¶ 132-135.

³¹ See *USTA Comments* at 5-6.

³² See 47 U.S.C. §160.

unrestricted, open eligibility in licensing new spectrum.³³ USTA urges the Commission to follow the letter of the law and affirm its initial finding that no restrictions on LEC participation in LMDS is warranted.

V. CONCLUSION

The record in this proceeding, public policy, and the 1996 Act provide uncontroverted support for unbridled LEC participation in LMDS auctions. USTA's members should not be barred from deploying LMDS in their local areas by arbitrary regulations that favor potential providers of voice and video service through LMDS. Imposition of an in-region ban on LEC participation in any auction or restrictive regulations regarding LEC deployment of LMDS can only reduce the financial return to the United States Treasury, and could deprive consumers of the rapid deployment of LMDS services.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

By: Keith Townsend

Mary McDermott
Linda Kent
Charles D. Cosson
Keith Townsend

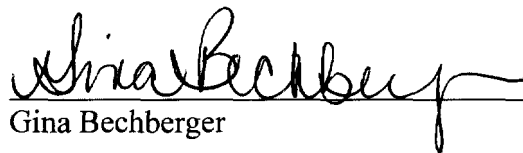
1401 H Street, NW
Suite 600
Washington, D.C. 20005
(202) 326-7247

August 22, 1996

³³ See *Comments of USTA* at 2-3; *Joint Comments of Bell Atlantic Corporation and SBC Communications, Inc.* at 3-6; *Comments of Ameritech* at 3-4.

CERTIFICATE OF SERVICE

I, Gina Bechberger, do certify that on August 22, 1996 copies of the Replies of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.


Gina Bechberger

Henry M. Rivera
Edwin N. Lavergne
Jay S. Newman
Ginsburg, Feldman & Bress, Chtd.
1250 Connecticut Avenue, NW
Washington, DC 20036

Jonathan D. Blake
Covington & Burling
1201 Pennsylvania Avenue, NW
P.O. Box 7566
Washington, DC 20004

Richard Rubin
Fleischman and Walsh
1400 16th Street, NW
Suite 600
Washington, DC 20036

Randall B. Lowe
Jones, Day, Reavis & Pogue
1450 G Street, NW
Washington, DC 20005

James L. Wurtz
Pacific Bell
& Nevada Bell
1275 Pennsylvania Avenue, NW
Fourth Floor
Washington, DC 20004

Betsy Granger
Pacific Bell & Nevada Bell
140 New Montgomery Street
Room 1525
San Francisco, CA 94105

R. Ross Gray
American Telezone
Intercell International, Inc.
13103 N. Moss Creek Drive
Cypress, TX 77429

Robert N. Reiland
Ameritech
30 South Wacker Drive
Suite 3900
Chicago, IL 60606

Mark S. Fowler
Latham & Watkins
1001 Pennsylvania Avenue, NW
Suite 1300
Washington, DC 20004

James F. Ireland
Cole, Raywid & Braverman
1919 Pennsylvania Avenue, NW
Second Floor
Washington, DC 20006

George Y. Wheeler
Koteen & Naftalin
1150 Connecticut Avenue, NW
Washington, DC 20046

Leonard J. Baxt
Dow, Lohnes & Albertson
1255 23rd Street, NW
Washington, DC 20037

Jimmy K. Omura
CYLINK Corporation
110 South Wolfe Road
Sunnyvale, CA 94086

John D. Lockton
Corporate Technology Partners
520 S. El Camino Real
San Mateo, CA 94010

Werner Hartenberger
Dow, Lohnes & Albertson
1255 23rd Street, NW
Suite 500
Washington, DC 20037

Robert S. Foosaner
Fleet Call, Inc.
1450 G Street, NW
Washington, DC 20036

Dennis R. Patrick
Time Warner Telecommunications,
Inc.
1776 Eye Street, NW
Washington, DC 20006

Winston E. Himsworth
Tel/Logic Inc.
51 Shore Drive
Plandome, NY 11030

Harold Mordkofsky
Blooston, Mordkofsky, Jackson &
Dickens
2120 L Street, NW
Washington, DC 20037

Gardner F. Gillespie
Hogan & Hartson
555 13th Street, NW
Washington, DC 20004

William J. Franklin
Pepper & Corazzini
200 Montgomery Building
1776 K Street, NW
Washington, DC 20006

Jeffrey Blumenfeld
Blumenfeld & Cohen
1615 M Street, NW
Suite 700
Washington, DC 20036

Andrew D. Lipman
Swidler & Berlin, Chtd.
3000 K Street, NW
Suite 300
Washington, DC 20037

Donald L. Schilling
SCS Mobilecom, Inc.
85 Old Shore Road
Suite 200
Port Washington, NY 11050

George H. Shapiro
Arent, Fox, Kintner, Plotkin &
Kahn
1050 Connecticut Avenue, NW
Washington, DC 20036

Richard McKenna, **HQE03J36**
GTE Service Corporation
P.O. Box 152092
Irving, TX 75015

Mark P. Royer
Southwestern Bell Corp.
One Bell Center
Room 3524
St. Louis, MO 63101

Charles D. Ferris
Mintz, Levin, Cohn, Ferris,
Glovsky & Popeo
701 Pennsylvania Avenue, NW
Suite 900
Washington, DC 20004

Michael B. Wiggen
M3 Illinois Telecommunications
Corp.
963 Ventura Drive
Palatine, IL 60067

Melodie A. Virtue
Haley, Bader & Potts
4350 North Fairfax Drive
Suite 900
Arlington, VA 22203

Howard J. Barr
Pepper & Corazzini
200 Montgomery Building
1776 K Street, NW
Washington, DC 20006

Robert M. Silber
National Captioning Institute, Inc.
5203 Leesburg Pike
Suite 1500
Falls Church, VA 22041

Peter Tannenwald
Arent, Fox, Kintner, Plotkin & Kahn
1050 Connecticut Avenue, NW
Washington, DC 20036

Ronald D. Maines
Maines & Harshman, Chtd.
2300 M Street, NW
Suite 900
Washington, DC 20037

Michael D. Kennedy
Michael A. Menius
Motorola, Inc.
1350 I Street, NW
Suite 400
Washington, DC 20005

Philip A. Malet
Alfred M. Mamlet
Pantelis Michalopoulos
Steptoe & Johnson
1330 Connecticut Avenue, NW
Washington, DC 20036

James G. Ennis
Barry Lambergman
Fletcher, Heald & Hildreth
1300 17th Street North
11th Floor
Arlington, VA 22209

Perry W. Haddon
1000 Ainsworth
Suite 310
Prescott, AZ 86301

Vason P. Srin
Dataflow System
986 Cragmont Avenue
Berkeley, CA 94708

Philip H. Mathes
Catel
4050 Technology Place
Fremont, CA 94637

Terry E. Blanchett
Security Alarm Co.
216 W. Main Street
Owosso, MI 48867

Julian P. Gehman
Blooston, Mordkofsky, Jackson &
Dickens
2120 L Street, NW
Washington, DC 20037

L.H. Stolz
A&I Telecommunications Div.
2001 Capitol Avenue
Room B1
Cheyenne, WY 82002

Paul S. Madison
Becker & Madison
1915 Eye Street, NW
8th Floor
Washington, DC 20006

James F. Ireland, III
Theresa A. Zeterberg
Cole, Raywid & Braverman
1919 Pennsylvania Avenue, NW
Suite 200
Washington, DC 20006

Michael R. Gardner
David Jepps
1150 Connecticut Avenue, NW
Suite 710
Washington, DC 20036

Paul J. Sinderbrand
Wilkinson, Barker, Knauer & Quinn
1735 New York Avenue, NW
Washington, DC 20006-5209

Dr. Daniel Niemeyer
University of Colorado at Boulder
360 Stadium, Gate 11
Campus Box 379
Boulder, CO 80309

Richard West
University of California
300 Lakeside Drive
Oakland, CA 94612

Richard S. Wilensky
Middleberg, Riddle & Gianna
2323 Bryan Street
Suite 1600
Dallas, TX 75201

Tom W. Davidson
Paul S. Pien
Akin, Gump, Strauss, Hauer & Feld,
L.L.P.
1333 New Hampshire Avenue, NW
Suite 400
Washington, DC 20036

George Petrutsas
Paul J. Feldman
Fletcher, Heald & Hildreth
1300 North 17th Street
11th Floor
Rosslyn, VA 22209

Linda Shea Gieseler
Farrow, Schildhause & Wilson
1400 16th Street, NW
Suite 501
Washington, DC 20036

Raymond A. Linsenmayer
U.S. Interactive and Microwave
Television Association
2300 M Street, NW
Suite 800
Washington, DC 20037

Marilyn Mohrman-Gillis
Association of America's Public
Television Stations
1350 Connecticut Avenue, NW
Suite 200
Washington, DC 20036

Paula A. Jameson
Gregory Ferenbach
Public Broadcasting Service
1320 Braddock Place
Alexandria, VA 22314

Albert Halprin
Stephen L. Goodman
Halprin, Temple & Goodman
1301 K Street, NW
Washington, DC 20005

Jay C. Keithley
Phyllis A. Whitten
Sprint Corp.
1850 M Street, NW
Suite 1100
Washington, DC 20036

Craig T. Smith
Sprint Corp.
P.O. Box 11315
Kansas City, MO 64112

Linda K. Smith
Robert M. Halperin
William D. Wallace
Crowell & Moring
1001 Pennsylvania Avenue, NW
Washington, DC 20004

Leslie A. Taylor, Esq.
Leslie Taylor Associates
6800 Carlynn Court
Bethesda, MD 20817

Todd G. Gray
Kenneth D. Salomon
Dow, Lohnes & Albertson
1255 23rd Street, NW
Suit 500
Washington, DC 20037

Kenneth Robinson
Lafayette Center
P.O. Box 57-455
Washington, DC 20036

Thomas A. Rose
Microelectornics Division
1011 Pawtucket Boulevard
P.o. Box 3295
Lowell, MA 01853

Roy J. Hebert
Alpha Industries, Inc.
651 Lowell Street
Methuen, MA 01844

Joseph D. Carney & Associates
18680 Rivercliff Drive
Fairview Park, OH 44126

Robyn G. Nietert
Brown, Nietert & Kaufman, Chtd.
1920 N Street, NW
Suite 660
Washington, DC 20036

Wade J. Henderson
National Association for the
Advancement of Colored People
Washington Bureau
1025 Vermont Avenue
Suite 730
Washington, DC 20005

Gary M. Epstein
Latham & Watkins
1001 Pennsylvania Avenue, NW
Washington, DC 20004

Daniel L. Bart
GTE
1850 M Street, NW
Suite 1200
Washington, DC 20036

Deborah H. Morris
Ameritech
30 South Wacker Drive
39th Floor
Chicago, IL 60606

James G. Pachulski
Edward D. Young III
Bell Atlantic Personal Comm.
1310 N. Courthouse Road
Arlington, VA 22201

Robert B. McKenna
U S WEST
1020 19th Street, NW
Suite 700
Washington, DC 20036

John W. Hunter
McNair Law Firm
1155 15th Street, NW
Washington, DC 20005

Michael J. Shortley, III
Rochester Telephone Center
180 South Clinton Avenue
Rochester, NY 14646

William F. Adler
Pacific Telesis
1275 Pennsylvania Avenue, NW
Suite 400
Washington, DC 20004

Coleen M. Egan Helmreich
Norm Curtright
Dan L. Poole
U S WEST, INC.
1020 19th Street, NW
Suite 700
Washington, DC 20036

Larry A. Blosser
Donald J. Elardo
MCI
1801 Pennsylvania Avenue, NW
Washington, DC 20006

John L. Bass
City of Long Beach
Department of Public Works
333 West Ocean Boulevard
Long Beach, CA 90802

Philip V. Otero
GE American Comms., Inc.
Four Research Way
Princeton, NJ 08540

Peter A. Rohrbach
Karis A. Hastings
Kyle D. Dixon
Hogan & Hartson, LLP
555 13th Street, NW
Washington, DC 20004

George Soderquist
ICE-G, Inc.
1433 East Second Avenue
Mesa, AZ 85204

Timothy E. Welch
Hill & Welch
1330 New Hampshire Avenue, NW
Washington, DC 20036

Marilyn Mohrman-Gillis
Lonna M. Thompson
Association of America's Public
TV Stations
1350 Connecticut Avenue, NW
Suite 200
Washington, DC 20036

John A. Davis
COMSTAT Comms., Inc.
Five Cherry Hill Drive
Danvers, MA 01923

Ronald Binz
Debra Berlyn
John Windhausen
Competition Policy Institute
1156 15th Street, NW
Suite 310
Washington, DC 20005

Don Hamada
City and County of Honolulu
Department of Transportation
Services
Pacific Park Plaza
711 Kapiolani Boulevard
Suite 1200
Honolulu, HI 96813

Jason Priest
ComTech Associates, Inc.
600 E. Las Colinas Boulevard #450
Irving, TX 75039

Joe D. Edge
Sue W. Bladek
Drinker, Biddle & Reath
900 15th Street, NW
Washington, DC 20005

Robert L. Shearing
SkyOptics, Inc.
2450 Marilouise Way
Suite 200
San Diego, CA 92103

Douglas A. Gray
HEWLETT-PACKARD CO.
1501 Page Mill Road, 4A-F
Palo Alto, CA 94304

Curtis T. White
Allied Associate Partners, LP and
Geld Information Systems
4201 Connecticut Avenue, NW
Suite 402
Washington, DC 20008

Edward Hayes, Jr.
1155 Connecticut Avenue, NW
Third Floor
Washington, DC 20036

Mateo R. Camarillo
Opportunities Now Enterprises, Inc.
8303 Clairemont Mesa Boulevard
Suite 201
San Diego, CA 92111

David Cosson
L. Marie Guillory
NTCA
2626 Pennsylvania Avenue, NW
Washington, DC 20037

Daniel L. Brenner
Diane B. Burstein
David L. Nicoll
NCTA
1724 Massachusetts Avenue, NW
Washington, DC 20036

Caressa D. Bennet
Gregory Whiteaker
Bennet & Bennet, PLLC
1019 19th Street, NW
Suite 500
Washington, DC 20036

Allen Holden, Jr.
City of San Diego - Traffic
Engineering Division
Executive Complex
1010 Second Avenue
San Diego, CA 92101

Mobile Source Air Pollution
Reduction Review Committee
21865 East Copley Drive
Diamond Bar, CA 91765

Jon Schill
RioVision, Inc.
P.O. Box 1065
1800 East Highway 83
Weslaco, TX 78596

Pioneer Telephone Assn., Inc.
120 North Baughman Street
Ulysses, KS 67880

Gerald C. Musarra
Lockheed Martin Corp.
1725 Jefferson Davis Highway
Suite 300
Arlington, VA 22202

Debra A. Smiley-Weiner
Lockheed Martin Astro Space
Commercial
1322 Crossman Avenue
Building 580
Sunnyvale, CA 94089

Raymond G. Bender, Jr.
Thomas K. Gump
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, NW
Suite 800
Washington, DC 20036

Douglas G. Lockie
Endgate Corp.
321 Soquel Way
Sunnyvale, CA 94086

David J. Mallof
WebCel Communications, Inc.
1800 M Street, NW
Suite 325S
Washington, DC 20036

Glenn B. Manishin
Glemenfeld & Cohen
1615 M Street, NW
Suite 700
Washingtonm DC 20036

Robert L. Pettit
Michel K. Baker
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006

Lucy W. Eggerth
Pacific Telesis Group
2410 Camino Ramon
Suite 100
San Ramon, CA 94583

Frank Michael Panek
Ameritech
2000 West Ameritech Center Drive
Room 4H84
Hoffman Estates, IL 60196

Walter H. Alford
John F. Beasley
William B. Barifeld
Jim O. Llewellyn
BellSouth
1155 Peachtree Street, NE
Suite 1800
Atlanta, GA 30309

David G. Frolio
David G. Richards
BellSouth
1133 21st Street, NW
Washington, DC 20036

Harry Felker
Iris E. Walker
City of Topeka
215 E. 7th - Room 352
Topeka, KS 66603

John L. McDaniel
Farmers Telephone Coop., Inc.
1101 East Main Street
Kingstree, SC 29556

George Petrutsas
Paul J. Feldman
Fletcher, Heald & Hildreth, PC
1300 North 17th Street
11th Floor
Rosslyn, VA 22209

James G. Pachulski
Bell Atlantic
1320 N. Courthouse Road
Eighth Floor
Arlington, VA 22201

Robert M. Lynch
Durward D. Dupre
Paul E. Dorin
SBC Comms.
One Bell Center
Suite 3520
St. Louis, MO 63101

Scott B. Tollefsen
Hughes Communications Galaxy,
Inc.
1500 Hughes Way
Long Beach, CA 90810

William Malone
Miller, Canfield, Paddock and
Stone
1225 19th Street, NW
Suite 400
Washington, DC 20036

Gerald P. McCartin
Mitchell Lazarus
Arent, Fox, Kintner, Plotkin & Kahn
1050 Connecticut Avenue, NW
Washington, DC 20036

ITS
2100 M Street, NW
Suite 140
Washington, DC 20036